

REMARKS

Claims 1-20, 22, 23 and 29 have been examined, all of which stand rejected. By the above amendments, claims 1, 2, 5-8, 11-15, 17-20 and 29 have been amended and new claims 30-33 have been added. Accordingly, claims 1-20, 22, 23, and 29-33 now are pending in the subject application. Favorable reconsideration of the application and allowance of all of the pending claims are respectfully requested in view of the above amendments and the following remarks.

Counsel thanks the Examiner for the telephone interview on June 30, 2009 in connection with this application. It was helpful to understand the Examiner's position in connection with the prior art references and to hear the Examiner's suggestions for amending the claims.

The Office Action rejects claims 1-4, 6-17, 19, 20, 22 and 23 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2002/0186698 to Ceniza ("Ceniza") in view of U.S. Patent No. 6,259,898 to Lewis ("Lewis").

The Office Action rejects claim 29 based on Ceniza and Lewis and further in view of U.S. Patent Publication No. 2002/0164983 to Raviv ("Raviv").

The subject matter of the present application relates to storing information in a wireless device, such as a wireless access point device that operates in a wireless network, which information represents the physical location of the wireless device. The information is stored in the wireless device in such a manner that when a record is created associated with the connectivity of a wireless roaming device, the record is populated with the information, and can thereafter be used for accounting and related functions.

The Examiner's comments in the Office Action are noted. In order to clarify the claimed subject matter, independent claims 1, 7, 17 and 29 are amended to recite that the ***location coordinates*** are received into the wireless transceiver device, wherein the location coordinates represent the ***physical location of the wireless device and are used to identify the wireless device among a plurality of wireless devices with which a roaming wireless device may wireless communicate***. Support for this claim language is found in the specification at page 7, line 9 to page 8, line 16, and at page 10, lines 1-6.

The Ceniza reference is directed to a system for mapping remote hosts located on remote local area networks connected to the Internet to appear as if they are devices attached to a single local area network (LAN). The techniques described in the Ceniza reference involve network address, e.g., IP address, management and various network translation techniques. However, nowhere does Ceniza mention a wireless network transceiver device that serves roaming wireless devices in a wireless network. There is no teaching anywhere in Ceniza of a wireless transceiver device.

Furthermore, while Ceniza describes manipulation of network addresses, it does not teach or suggest storing *location coordinates representing a physical location of a wireless transceiver device*. Addresses referred to in Ceniza do not indicate the physical location of a device. Rather, those addresses identify a device in connection with a network hierarchy within a networking address scheme. A network address is a network identifier of a device but it does not represent the physical location of that device. A network device in Ceniza can be assigned an IP address, but the device can be moved from one physical location to another while still using that same IP address, and the network operation will continue normally. However, there is no way to identify a network device other than by its network address, which again, *is not the same as location coordinates* and does not indicate its physical location.

By contrast, in the wireless communication environment called for in the claims of the present application, roaming wireless devices may connect to different network access points depending on the ability of the roaming wireless device to receive wireless signals from a network access point device, which is primarily determined by the physical location of the network access point device relative to the physical location of the roaming wireless device. Tracking connectivity of a roaming wireless device to one or more of a plurality of wireless network access points is not a concern in wired network environment such as that of Ceniza. In fact, as is known in the art, a wireless access point device will also have a network address (e.g., an IP address) assigned to it, which is no different than the network addresses referred to in Ceniza. Nevertheless, the present invention as recited in the claims involves expanding on the basic capabilities of wireless network access point device by configuring a wireless network access point device to store records associated with connectivity with roaming wireless devices,

where each record further includes the *already stored location coordinates* representing the physical location of the wireless network access point device to which the roaming wireless device is wirelessly connected.

The Lewis reference discloses that a main processor apparatus that connects to multiple access points stores data in a table indicating with which access point individual mobile terminals may have registered for service. In Lewis, the storage of the records does not occur in an individual access point, but rather in a higher level device that is monitoring registrations of mobile terminals across multiple access points. ***By contrast, as recited in all of the independent claims in the present application, the storage of both the location coordinates and the associated records that track connectivity of a roaming wireless device occurs within the wireless access point device itself.*** Thus, once the static location information is written into the memory of an individual access point device, all records generated in that access point device will include the location information for that access point.

The Raviv reference is cited merely for its alleged teaching or remote authentication. It otherwise does not add any other teaching to the Ceniza-Lewis combination that is relevant to the core features of independent claim 29 as described above.

It is respectfully submitted that the subject matter recited in independent claims 1, 7 and 17 is not obvious over Ceniza in view of Lewis. Ceniza fails to disclose the fundamental location storage feature recited in the claims as explained above. Furthermore, Lewis fails to teach the generation and storage of records within a wireless transceiver device, e.g., access point. For these reasons, it is respectfully requested that the rejection of independent claims 1, 7, 17 and 29 under 35 U.S.C. §103(a) be withdrawn, and that claims 1, 7, 17 and 29 and all the claims that depend therefrom are in condition for allowance.

The Office Action rejects claims 5 and 18 based on the Ceniza-Lewis combination and further in view of U.S. Patent No. 6,233,452 to Nishino ("Nishino").

The Office Action refers to steps S212 and S214 shown in FIG. 5 of Nishino as allegedly being suggestive of accepting physical location information into a wireless access point device from an external device. There, Nishino is describing a function where a mobile terminal does not have a record for a telephone number of an access point terminal. On such occasion,

Nishino describes that a user may manually enter the telephone number of the access point terminal. See relevant text from Nishino copied below.

It is assumed here that a user of the information processing terminal 100 starts terminal software such as "Browser" for browsing a Web page, "Mail" for exchanging electronic mail or the like (step S206). Since starting of "Browser" or "Mail" is subject to connection to the Internet, it requests another terminal software, "Dialer", to connect to the Internet. First, "Dialer" extracts an NTT exchange identification number from the current CS-ID previously acquired and, then, retrieves a record for this identification number from the past "communication record table" (step S208). If there is any communication record for the current NTT exchange identification number, this record is referenced to acquire a telephone number of the nearest access table. Then, "Dialer" dials the acquired telephone number of this access point (step S216).

On the other hand, if there is no communication record for the current NTT exchange identification number for any reason (e.g., this is the first occasion to access the Internet from the current cell), a user is prompted on the display 21, for example, to manually input a telephone number of a desired access point (step S212). Thereafter, a record that describes an association between the inputted telephone number of this access point and the current NTT exchange identification number is written into the "communication record table" (step S214). Then, the telephone number of this access point is dialed accordingly. (emphasis added)

Nishino merely teaches that a user may manually enter into his/her mobile terminal a telephone number for an access point. Nishino does not teach accepting from an external source the physical location information into a wireless transceiver device, particularly when claims 5 and 18 are viewed in connection with claims 1 and 17 as amended herein. Therefore, claims 5 and 18 should be patentable over the Ceniza-Lewis-Nishino alleged combination. Claim 11 is amended herein to also recite subject matter similar to claims 5 and 18, and therefore should be allowable for the same reasons as claims 5 and 18.

Claim 12 recites that the physical location information is in the form of longitude, latitude and altitude coordinates of the wireless transceiver device. The Office Action admits that there is no teaching or suggestion in Ceniza and Lewis of storing location coordinates into the wireless device, yet somehow contends that it would be obvious to do so. Applicants respectfully disagree. Given that neither Ceniza nor Lewis teach or suggest storing physical

location information into a wireless device, as argued above in connection with the independent claims 1, 7, 17 and 29, it is respectfully submitted that it would not be obvious to one of ordinary skill in the art, based on the teachings of Ceniza and Lewis, to conceive of storing location coordinates of the wireless transceiver device into the wireless transceiver device as static information to be stored with each record generated for a roaming wireless device. Withdrawal of the rejection of claim 12 is respectfully solicited.

New claims

New claim 30 depends from claim 5 and recites the computer code that accepts the static location coordinates is a text editor that receives text from a keypad or keyboard input device into the wireless transceiver device. New claims 31-33 depend from claims 7, 17 and 29, respectively, and recite that the text editor function that receives from a keypad or keyboard device text for location coordinates. There is no teaching or suggestion in any of the references of record of the subject matter of claims 30-33.

In view of the foregoing, Applicant respectfully requests the Examiner to find the application to be in condition for allowance with claims 1-20, 22, 23, and 29-33. However, if for any reason the Examiner feels that the application is not now in condition for allowance, the Examiner is respectfully requested to call the undersigned attorney to discuss any unresolved issues and to expedite the disposition of the application.

No fees are believed to be due because the number of canceled claims exceeds the number of newly added claims. Applicant hereby petitions for any extension of time that may be necessary to maintain the pendency of this application. The Commissioner is hereby authorized to charge payment of any additional fees required for the above-identified application or credit any overpayment to Deposit Account No. 05-0460.

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